

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE**

PARAGON COMPONENT)	
SYSTEMS, LLC,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 1:24-cv-00246-CEA-CHS
)	
QUALTIM, INC., CENTER FOR)	
BUILDING INNOVATION, LLC,)	
DRJ ENGINEERING, LLC,)	
INSPIRED PURSUITS, LLC,)	
KIRK GRUNDAHL, and)	
SUZANNE GRUNDAHL,)	
)	
Defendants.)	

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANTS’ MOTION TO DISMISS**

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Plaintiff Paragon Component Systems, LLC moves this Court for an extension of the deadline to respond to Defendants’ Motion to Dismiss, Add Necessary Parties, and Transfer Venue (Doc. 21) to November 15, 2024. Plaintiff has conferred with Defendants, who represented that the Defendants do not oppose the extension sought by this Motion. Plaintiff respectfully submits that this unopposed extension is necessary to investigate and respond to all of the issues raised in the Defendants’ Motion to Dismiss, Add Necessary Parties, and Transfer Venue, including its several cited declarations and exhibits¹, and in view of Plaintiff’s limited availability to confer with its counsel during the normal response period.

Plaintiff reserves its right to subsequently move this Court for an Order granting a limited initial discovery period solely for the purposes of seeking jurisdictional discovery in response to

¹ Plaintiff first received redacted copies of Exhibits 2-8, 10-14, 16, and 21 in support of Defendants’ Motion on October 10, 2024, and first received unredacted versions on October 11, 2024. These exhibits are the subject of Defendants’ Motion to File under Seal (Doc. 29).

the many allegations of lack of personal jurisdiction, improper venue, and missing necessary parties asserted in Defendants' Motion to Dismiss, Add Necessary Parties, and Transfer Venue.²

Respectfully submitted October 18, 2024.

MILLER & MARTIN PLLC

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***Counsel for Plaintiff Paragon Component
Systems, LLC***

² Defendants have represented that they would oppose any motion seeking a limited initial discovery period focused solely on jurisdictional issues and related representations that Defendants made in their Motion to Dismiss, Add Necessary Parties, and Transfer Venue (including in their attached declarations and exhibits).

CERTIFICATE OF SERVICE

I certify that on October 18, 2024 a copy of the foregoing Plaintiff's Unopposed Motion for Extension of Time to Respond to Defendants' Motion to Dismiss is being served on all counsel of record by electronically filing it via the Court's filing system.

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